

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

AMPEX CORPORATION,)	
)	
Plaintiff,)	C.A. No. 04-1373 (KAJ)
)	
v.)	
)	
EASTMAN KODAK COMPANY,)	
ALTEK CORPORATION, and)	
CHINON INDUSTRIES, INC.,)	
)	
Defendants.)	

**NOTICE OF DEPOSITION OF
DEFENDANT EASTMAN KODAK COMPANY**

PLEASE TAKE NOTICE: Pursuant to Federal Rule of Civil Procedure 30(b)(6), Ampex will take the deposition of Defendant Eastman Kodak Company (“Kodak”), commencing on September 13, 2006, at 11:00 a.m., at the Hyatt Regency, 125 East Main Street, Rochester, New York, USA 14604, or at such other time and place agreed upon by the counsel to the parties.

Kodak shall designate one or more of its officers, directors or managing agents, or other persons with knowledge of the matters set forth in Schedule A of this notice to appear and testify on its behalf at the deposition. The persons so designated shall testify as to matters known or reasonably available to Kodak.

This examination will be taken before a Notary Public or other person authorized to administer oaths and will be recorded stenographically and/or by video and shall continue from day to day until completed.

You are invited to attend and cross-examine.

MORRIS, NICHOLS, ARSHT & TUNNELL LLP

/s/ Julia Heaney

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August 22, 2006

SCHEDULE A

INSTRUCTIONS AND DEFINITIONS

Ampex incorporates by reference the instructions and definitions set forth in its First, Fourth, and Sixth Sets of Document Requests to Defendant Eastman Kodak.

SUBJECT MATTER CATEGORIES

1. Each study, analysis, or opinion, whether written or oral, relating to infringement or non-infringement of the Patent-in-Suit.
2. All written and oral communications relating to each study, analysis, or opinion, whether written or oral, relating to infringement or non-infringement of the Patent-in-Suit.
3. All written or oral communications between Kodak, or its attorneys, and any person involved in the drafting of opinion(s) of counsel upon which Kodak intends to rely, including without limitation any person involved in any analysis related to such opinion(s).
4. All advice of counsel Kodak received or obtained regarding infringement or non-infringement of the Patent-in-Suit.
5. All actions taken by Kodak in response to, or in reliance upon, advice of counsel, including without limitation opinion(s) of counsel, regarding infringement or non-infringement of the Patent-in-Suit.
6. All actions taken by Kodak in response to receiving notice of, or becoming aware of, the Patent-in-Suit, whether such notice was received through communication with Ampex or otherwise.
7. All actual or proposed product clearances conducted by Kodak that involved the Patent-in-Suit, including without limitation the circumstances surrounding each actual or proposed product clearance.
8. The identity, location and detailed explanation of all documents and things concerning the foregoing topics.
9. The identity and location of persons knowledgeable about the foregoing topics.

CERTIFICATE OF SERVICE

I, Julia Heaney, hereby certify that on August 22, 2006, I caused to be electronically filed the foregoing with the Clerk of the Court using CM/ECF, which will send notification of such filing(s) to the following:

Collins J. Seitz, Jr., Esquire
Jaclyn Mason, Esquire
Connolly, Bove, Lodge & Hutz LLP

and that I caused copies to be served upon the following in the manner indicated:

BY EMAIL AND FEDERAL EXPRESS

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